



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 4  
ATLANTA FEDERAL CENTER  
61 FORSYTH STREET  
ATLANTA, GEORGIA 30303-8960

OCT 26 2016

CERTIFIED MAIL 7011 3500 0003 2064 3766  
RETURN RECEIPT REQUESTED

Mr. Billy R. Mayes, P.E.  
Utilities Director  
City of Dothan  
200 Kilgore Drive  
Dothan, Alabama 36301

Re: City of Dothan, Alabama Utilities Department  
Administrative Order on Consent, Docket No.: CWA-04-2012-4780  
EPA and ADEM comments on the Sewer Overflow Response Plan

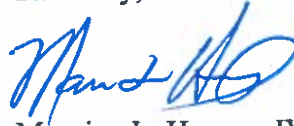
Dear Mr. Mayes:

The United States Environmental Protection Agency Region 4 has reviewed the City of Dothan, Alabama's (Dothan) September 9, 2013 response to EPA comments on the Sewer Overflow Response Plan (SORP), submitted pursuant to Paragraph 14.(A) of the above referenced Administrative Order on Consent (AOC) on January 15, 2013. The EPA, after consultation with ADEM, hereby offers the following additional comments on the SORP.

- Page 5, SSO Response Procedure – We request the word “may” be included in the statement “...and in the event of an SSO which reaches Waters of the State and/or may imminently and substantially endanger human health based on potential for public exposure...”
- Page 10, SSO Reporting – Dothan describes SSOs reaching waters of the State as an “SSO where sewage was observed running to surface waters, or there was obvious indication that sewage flowed to surface waters” We would like the statement to be revised to include groundwater as a water of the state.
- Page 10-11, SSO Reporting – In the bulleted items for “information regarding the SSO should include the following” we would like a bullet included to indicate whether or not the SSO may imminently and substantially endanger human health based on potential for public exposure including but not limited to close proximity to public or private water supply wells or in areas where human contact would be likely to occur.

The EPA will give final approval upon resubmission of the SORP addressing the above comments. Dothan should submit a revised SORP within thirty (30) days of receipt of this letter. Please contact Mr. Brad Ammons at (404) 562-9769 or via email at [ammons.brad@epa.gov](mailto:ammons.brad@epa.gov) if you should have any questions regarding this matter.

Sincerely,



Maurice L. Horsey, IV, Chief  
Municipal and Industrial Enforcement Section  
NPDES Permitting and Enforcement Branch

cc: Mr. Adam G. Sowatzka  
Partner, King and Spalding

Ms. Daphne Lutz  
Alabama Department of Environmental Management